

Plaintiff's Exhibit J

Plaintiff's Interrogatory Response Explaining His Desire to Return Certain Physical Items

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, to the extent that any such documents can be located by a reasonable and proportional search. Plaintiff will coordinate with Defendants to return certain physical documents that cannot be easily scanned or returned electronically. For the avoidance of doubt, Plaintiff is withholding documents based on the objections and descriptions noted herein.

REQUEST FOR PRODUCTION NO. 19:

All documents sent from plaintiff's Davis Polk email address to any non-Davis Polk email address accessible to or controlled by plaintiff, including plaintiff's personal email address(es).

¹¹ For example, Plaintiff has in his possession certain spiral bound "closing sets"/booklets that have no bearing on any of the claims or defenses in this action. Given the voluminous nature of such materials, and to avoid any issues with scanning such documents to create electronic versions of them, Plaintiff is willing to make such documents available to Defendants for inspection.